

1 ANGELA H. DOWS, ESQ.
2 Nevada Bar No. 10339
adows@crdslaw.com
3 CORY READE DOWS & SHAFFER
1333 North Buffalo Drive, Suite 210
Las Vegas, Nevada 89128
4 Telephone: (702) 794-4411
Facsimile: (702) 794-4421
5 Appointed Counsel for Defendant Susan Cope

6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

8 ***

9
10 UNITED STATES OF AMERICA,) 2:15-cr-00266-APG-VCF-3
11)
12 Plaintiff,)
13)
14 v.) **STIPULATION TO CONTINUE**
15 SUSAN COPE,) **SENTENCING HEARING**
16) (First Request)
17 Defendant.)
18)
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)

16 IT IS HEREBY STIPULATED by and between the United States of America, by and
17 through Jason M. Frierson, United States Attorney, and Jean N. Ripley, Assistant United States
18 Attorney; SUSAN COPE, Defendant, by and through her counsel, Angela H. Dows, Esq. that the
19 sentencing hearing in the above-entitled matter, currently scheduled for April 18, 2023, at the
20 hour of 10:00 a.m., be vacated and continued for approximately thirty (30) days, or to a date and
21 time to be set by this Honorable Court. This is the first request for a continuance in this case.
22
23 This Stipulation is entered into based upon the following:

24 1. Defendant Susan Cope requests additional time to be able to address one or more
25 of the following: (a) contingent living arrangements that need to be addressed prior to the
26 potential imposition of any custodial sentence, (b) gathering certain medical documents
27 and information on her behalf in preparation for sentencing.
28

1 2. Instant defense counsel also requests additional time to be able to adequately
2 represent her client in relation to sentencing, including gathering additional sentencing
3 information on behalf of the client.

4 3. Defendant SUSAN COPE has no objection to the continuance, and moreover
5 requested the subject continuance for the reasons stated.

6 4. The government does not object to the proposed continuance.

7 5. For all the above-stated reasons, the ends of justice would best be served by a
8 continuance of the April 18, 2023 sentencing hearing.

9
10 DATED this 6th day of April, 2023.

11 JASON M. FRIERSON
12 United States Attorney
13 By: /s/ Jean N. Ripley
14 JEAN N. RIPLEY
15 Assistant United States Attorney
16 Counsel for Plaintiff

17 CORY READE DOWS & SHAVER
18 By: /s/ Angela H. Dows
19 ANGELA H. DOWS, ESQ.
20 Appointed Counsel for Defendant
21 Susan Cope

1
2
3
4
5
6
7
8
9
10
11
12
13
14

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

FINDINGS OF FACT

16 Based on the pending Stipulation of the parties, and good cause appearing therefore, the
17 Court finds that:

1. Defendant requests additional time in order to address one or more matters prior
19 to sentencing that may impact her living arrangements related to any potential
20 custody following her sentencing;

21

22 2. Defendant's counsel also requests additional time to prepare for Susan Cope's
23 sentencing, including assisting in gathering any additional documentation Susan
24 Cope provides in support thereof;

25

26 2. Counsel for Defendant has conferred with her client, and Defendant SUSAN
27 COPE has no objection to the requested continuance to the sentencing date.

28

3. The government does not object to the proposed continuance.

CONCLUSIONS OF LAW

1. Denial of this request for continuance would result in a miscarriage of justice, as additional time is needed for the Defendant SUSAN COPE to prepare for the sentencing hearing, and review the file and the case with counsel for the defense.

2. For all the above-stated reasons, the ends of justice would best be served by a continuance of the sentencing hearing.

ORDER

IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for April 18, 2023 at 10:00 a.m., be vacated and continued to May 24, 2023, at the hour of 1:30 p.m., in Courtroom 6C.

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

DATED: April 7, 2023